

16. Both the apartment complex owners and GTESW benefited from the laying of GTESW's cable in its current location at the time of construction.
17. Complainants did not install their own network cable at the time the apartment complexes in question were constructed.
18. STS providers have operated in Texas since 1984, and in GTE service territory since 1986.
19. In newly constructed buildings where it has not already installed interbuilding cable, GTE places a single demarcation point at the minimum point of entry at the owner's or her agent's request.
20. At the time of construction, GTESW will place demarcation points wherever the apartment complex owner requests them.
21. The only terms and conditions in GTESW's General Exchange Tariff for placing the demarcation point in multi-unit properties are contained in GTESW's STS tariff, which is attached as Exhibit "A".
22. GTESW's STS Tariff was approved on March 10, 1986 in Docket No. 6076.
23. GTESW's STS tariff, Section 44 Sheet 5 provides:

The Telephone Company shall terminate its Network Access Facilities at a mutually agreeable point of demarcation. The point of demarcation is the point of interconnection of

the local exchange company with the facilities and terminal equipment of the STS provider in a manner no different than that provided under Part 68 of the FCC Rules and Regulations

24. Both Complainants and GTESW agree that the phrase "mutually agreeable" should be given its ordinary business meaning, which is that both parties to a transaction must be satisfied with the transaction. In most cases, mutually agreeable means a compromise of positions, not the arbitrary imposition of one position over the other
25. The Complainants and GTESW have not been able to agree as to whether GTESW is required to relocate multiple demarcation points to a single point after establishing multiple demarcation points at the time of construction. The Complainants and GTESW also have not been able to agree on whether the relocation of the demarcation points would permit the Complainants to jointly use, lease or purchase GTESW's previously installed network cable
26. The Complainants and GTESW have not been able to agree to the sale or lease of GTESW's previously installed network cable in the properties in question.
27. In September 1992, GTE Telephone Operations adopted Demarcation Guidelines, GTEP 610-148-010, containing specific terms and conditions for placing demarcation points in accordance with CC Docket No. 88-57. GTEP 610-148-010 is attached as Exhibit "B". This document superseded GTESW's previous written demarcation guidelines which date back to 1982.
28. The Complainants do not dispute that GTEP 610-148-010 is consistent on the whole with FCC Rules or rulings

29. Neither complainants nor PUC staff contend that GTEP 610-148-010 is inconsistent with the FCC Rules. The Complainants contend that GTESW applies GTEP 610-148-010 in an unreasonable and anticompetitive manner. PUC staff recommends minor clarifications to GTEP 610-148-010 in Exhibit "C".
30. GTESW does not have a written policy regarding whether it will relocate demarcation points for the purpose of allowing use, purchase or lease of its existing network cable.
31. GTESW has not filed tariff amendments with the PUC to redefine the location of the demarcation point on a customer's premises subsequent to the FCC's June 14, 1990 decision in CC Docket No. 88-57.
32. GTESW did not file tariff amendments following the issuance of the order in CC Docket No. 88-57 because it did not believe it was required to do so by law and because its existing tariff requires it to comply with all FCC rules and regulations without any time limitations. GTESW did, however, modify its internal demarcation guidelines to comply with the order in CC Docket No. 88-57.
33. The multiple demarcation points for the following apartment complexes are currently located at the minimum point of entry where GTESW's network cable enters each building and not at a single point at or near the property line: Deer Run, Crows Nest, Anchorage, Bridgeport and Signature Point.
34. At Palms at South Shore Apartments, the demarcation point is located at a single point negotiated between ResCom and GTESW.

- 35 MTS requested that GTESW sell the inter-building cable in the Deer Run Apartments in late 1993
- 36 It took MTS and GTESW several months to evaluate numerous potential locations for the placement of the minimum point of entry before they located an appropriate site in late 1994
- 37 GTESW is required to comply with the National Electric Code, which determines grounding requirements for telephone wires.
- 38 There was never a written contract for the relocation of demarcation points or the sale of GTESW's previously installed network cable at the Deer Run Apartments.
- 39 With respect to Deer Run, GTESW employees indicated to MTS representatives that GTESW would negotiate with MTS to establish a mutually agreeable demarcation point and that GTESW would consider selling its interbuilding cable to MTS as MTS had requested.
- 40 Mr. Tee Weeks at GTESW notified MTS in January 1995 that a new manager, Mr. Ron Knight, had decided not to relocate the demarcation points and not to sell the interbuilding cable at Deer Run Apartments.
- 41 In or around the second quarter of 1994, ResCom requested that GTESW relocate the multiple demarcation points in the apartment complexes in question to a single minimum point of entry (MPOE) in a switchroom so that it could jointly use, lease or purchase GTESW's previously installed network cable from the demarcation point at its new location to each apartment building in question in order to provide telephone service to the apartment tenants

42. Complainants offered to share use of GTE's cable while GTE retained ownership of the cable.
43. Complainants offered to pay GTESW for the cost of relocating the demarcation points.
44. Complainants offered to purchase GTESW's cable in the above-listed properties.
45. With respect to the Palms at South Shore, an apartment complex in League City, Texas, GTESW employees indicated to ResCom representatives that GTESW would negotiate with ResCom to establish a mutually agreeable demarcation point and that GTESW would sell its interbuilding cable to ResCom as ResCom had requested.
46. GTESW agreed on November 10, 1994, to relocate multiple demarcation points at the Palms of South Shore Apartments to a single MPOE and sell the interbuilding cable at the Apartments to ResCom at its depreciated value.
47. Subsequent to the Palms at South Shore agreement, GTESW and ResCom began negotiating to relocate the multiple demarcation points and sell interbuilding cable for the Bridgeport Apartments in Irving, Texas.
48. ResCom installed a PBX at the Bridgeport Apartment Complex. Subsequently, negotiations for the sale of the interbuilding cable on this property stopped.
49. On or about the beginning of December 1994, and approximately two weeks before ResCom understood service was to be cut over in the Bridgeport Apartment Complex, GTESW

informed ResCom that it would not relocate the demarcation points or sell the interbuilding cable to ResCom.

50. ResCom was informed that GTESW had reevaluated its position on the relocation of demarcation points and sale of cable around early December 1994 and that there had been a reorganization at GTESW and the person that had negotiated with ResCom would no longer handle these matters.

51. On January 20, 1995, Mr. Ron Knight, General Manager-Network Construction, the person at GTESW who is now in charge of GTESW demarcation and cable sale policy, met with ResCom representatives and stated at that meeting that GTESW had driven a stake in the ground on this issue. Mr. Knight's explanation of this comment is that at the time of that meeting, GTESW had not made its final determination as to whether it would agree to relocate demarcation points for the purpose of allowing STS providers to use its previously installed cable, or purchase the cable. Mr. Knight felt that he needed a stake or an "anchor" in the ground before he went any further.

52. In that same meeting, Mr. Simons believes that Mr. Knight or other GTESW representatives present at the meeting made the statement that GTESW "was not about to help any competitor." Mr. Knight does not believe he or any other GTESW representative made such a statement.

53. In that same meeting, Mr. Knight believes that he proposed that GTESW and GE Capital ResCom enter into a joint venture or a partnership arrangement in order to accomplish mutually satisfactory goals. Mr. Simons does not believe Mr. Knight made such a proposal.

54. When ResCom representatives requested a copy of GTESW's internal guidelines concerning placement of demarcation points, GTESW representatives replied that GTESW's guidelines were proprietary and could not be provided to them.
55. GTE's demarcation guidelines state that they are for use only by GTESW employees and approved contractors.
56. GTESW refused to relocate its demarcation point or sell its cable to Complainants in the following properties in GTESW territory: Bridgeport Apartments, The Anchorage, Crow's Nest, Signature Point, and Deer Run.
57. GTESW has not refused to provide Complainants with an additional demarcation point from which they could build out their own network cable.
58. Complainants do not seek an additional demarcation point from which they could build out their own network cable.
59. Complainants believe it is unnecessary and inefficient to incur the expense of building out their own duplicate network cable from an additional demarcation point provided by GTESW.
60. In August 1994, GTESW completed construction of OSP cable facilities within the Signature Point Apartment Community in League City, Texas.

- 61 In December 1994, GE Capital-ResCom sent GTESW a letter expressing its desire to intercept GTESW's cable and re-route it to GE Capital-ResCom's switch, which would consist of a PBX on the property. See December 1, 1994 letter attached as Exhibit "D".
- 62 The actual location of the demarcation point(s) at the apartment complexes in question affects the STS providers' ability to use GTESW's embedded network cable. Such use could be upon sale, lease or joint agreement as Complainants offered.
- 63 ResCom filed an informal complaint with the Commission's Consumer Affairs division on February 21, 1995.
- 64 ResCom and MTS filed this joint complaint on May 30, 1995.
- 65 Complainants contend that GTESW can recover its capital investment in the interbuilding cable by selling it at its net book value. However, GTESW believes the inter building cable has investment value to both GTESW and the Complainants as long as the cable is in functioning condition.
- 66 Complainants contend GTESW could save maintenance expense associated with the interbuilding cable if the same is sold to complainants. GTESW does not wish to be relieved of this "expense."
- 67 In Texas, Southwestern Bell and Sprint-United have worked with ResCom to relocate demarcation points to a single, minimum point of entry.

68. ResCom's PBX installed at the Bridgeport Apartments is not in use because ResCom believes it should not have to incur the cost of installing its own duplicate network cable to provide STS to potential customers when GTESW's network cable is already in place.
69. It would cost ResCom many thousands of dollars to dig trenches and lay duplicate cable to serve customers in the Bridgeport apartments.
70. MTS currently is not providing service to the Deer Run Apartments because it believes it should not have to incur the cost of installing its own duplicate cable to provide STS to potential customers when GTESW's existing network cable is already in place.
71. It would cost MTS approximately \$50,000 to duplicate the cable facilities already in place at the Deer Run Apartments.
72. To lay duplicate cable, Complainants would have to dig up landscaping and disrupt sidewalks and parking lots which premises owners typically do not want.
73. Building duplicate interbuilding cable in multi-tenant buildings is 25 to 50% more costly to the Complainants than rearrangement and use of existing cable.
74. These costs alone can dissuade competitors from entering the RMTS market. However, GTESW does not determine the costs that will be incurred by complainants to build a duplicate network cable or to use alternative technology to reach potential customers.
75. ResCom has not installed another PBX in properties located in GTESW territory.

76. Attached as Exhibit "E" is an e-mail message dated December 2, 1994 from David Isaacs to Jerry Eden regarding the potential sale of GTESW's outside plant cable. David Isaacs and Jerry Eden are lower level employees than Ron Knight.
77. Exhibit "E" was transmitted during a period of transition before Ron Knight. General Manager - Network Construction, had assumed full responsibility for his new position.
78. Exhibit "E" was not addressed to Ron Knight or his predecessor and was neither requested by Ron Knight or his predecessor. Ron Knight had not seen Exhibit "E" prior to the discovery process in this Complaint proceeding.
79. The information in Exhibit "E" did not play a part in Ron Knight's decision not to sell or allow the Complainants to use GTESW's previously installed network cable.
80. After assuming full responsibility for his new position, Ron Knight made a fresh inquiry into whether GTESW was required to sell or allow third parties to use its outside plant cable. Having conferred with legal and executive officers of the company, Ron Knight concluded that GTESW was within its legal rights to refuse to sell or allow the Complainants to use its outside plant cable. This decision was not based on any written internal guideline.
81. Prior to GTESW's decision to elect incentive regulation in September 1995, under Subchapter H of PURA, the interbuilding cable affected by this complaint was included in GTESW's regulated rate base.

82. Prior to GTESW's decision to elect incentive regulation in September 1995, Subchapter H of PURA, depreciation expense related to the cable plant affected by this complaint was included in GTESW's regulated cost of service.
83. Placing the demarcation point at a single minimum point of entry allows a single point of interface between the property's telecommunications system and the local exchange network, rather than multiple points of demarcation and interface at different buildings on the property.
84. Before Mr. Knight took over as General Manager, GTESW did not have a policy or practice regarding the relocation of demarcation points to a single point at the property owners request for purposes of allowing STS providers to use, lease or purchase GTESW's previously installed network cable.
85. The following GTE representatives were involved in evaluating and tentatively agreeing to relocate the demarcation points and sell the cable at Deer Run: Dolores Bennett (Marketing Representative); Bruce Cole (Vice President, Sales); Dennis Meyers (Vice President - Construction); Lydia Ramone (Marketing Representative); John Apel (President). Messrs. Cole and Meyers approved the business plan to tentatively sell the interbuilding cable at Deer Run.
86. Larry Gaskin is Ron Knight's predecessor as General Manager-Network Construction.
87. GTE Telephone Operations Guidelines are intended to apply to all GTE operating companies nationwide including GTESW. Section 2.1 of GTEP 610-148-010 internal guidelines states that: All elements of this practice must be adopted and implemented by all operating regions and divisions, for all classes of network services, except for those locations where other

simple wiring applications have been mandated through individual state regulatory commission/agency rulings

88. In California and Washington, GTE subsidiaries have previously relocated demarcation points to a single MPOE. In California, GE Capital ResCom dealt with GTE California, Inc. In Washington, GE Capital ResCom dealt with GTE Northwest, Inc. These two companies are separate and distinct from GTESW and have no control over GTESW. Nor does GTESW have any control over these entities. How these two separate GTE subsidiaries deal with demarcation points would be subject to the laws of their respective states and the tariffs applicable in those states.
89. GTE California, GTE Northwest and GTESW are subject to GTE Telephone Operations policies in GTEP 610-148-010.
90. GTEP 610-148-010 does not incorporate a specific example of a situation where GTESW has previously installed network cable that extends to each apartment building and where an STS provider subsequently requests a relocation of the demarcation point solely for the purpose of joint use or purchase of GTESW's previously installed cable.
91. Section 3.3.2 of GTEP 610-148-010 states that "The point of demarcation can be established at the property line in cases where the owner desires it. Examples of cases in which it would be appropriate to establish the demarcation point at the property line are:
- A college campus acquires federal funding that includes the cost of placing OSP cabling throughout the campus.
 - The owner refuses additional construction charges to provide network access to marinas and campgrounds."

- 92 GTESW's written interpretation of its previous Demarcation Guidelines (that were superseded by GTEP 610-148-010) contains the following question and answer:

Question 10 Once the point of demarcation is established, can the customer request a re-arrangement or an alternate location for the point of demarcation?

Answer: Yes; however, once the point of demarcation is established any alteration or modification to the point of demarcation will be at the customer's expense. GTESW will not re-locate the point and/or points of demarcation without charging the customer for the relocation expense. It must be noted that any alternate location must continue to be placed at minimum point of entry.

- 93 This question and answer is not part of GTE's written demarcation practice GTEP 610-148-010 that was adopted in September 1992. It was written in September 1991 as part of a field guide written to specifically assist outside plant work force with implementation of FCC Docket No. 88-57. However, GTEP 610-148-010 is not in conflict with the answers provided in the 1991 document. When confronted with the issue for the first time, Ron Knight, GTESW General Manager-Network Construction, established a policy of not relocating multiple demarcation points to a single demarcation point at the request of STS providers where the sole purpose would be to allow STS providers to use, purchase or lease GTESW's previously installed cable. The Complainants were not aware and were never told that GTESW was willing to relocate demarcation points for security reasons. Security issues were not raised by either side during the negotiation process.

- 94 Signature Point Apartments were constructed and wiring was installed there in 1994.

95. GTESW's OSP interbuilding network cable at the apartment complexes in question has not been modified, rearranged or added to since it was initially installed
96. The inside wire at the apartment complexes in question has been rearranged, modified or added to since it was initially installed
97. Since Section 44, Sheet 5 was initially approved in 1986, GTE has had only the six requests in this complaint to relocate demarcation points
98. The complainants do not propose to interconnect with GTESW's network facilities in a manner inconsistent with the technical requirements in Part 68 of the FCC's rules.
99. The FCC Rules do not prohibit multiple demarcation points located where GTESW's network cable enters each apartment building.
100. The language in GTESW's STS tariff has not changed since 1986 when it was first approved
101. GTE's refusal to relocate the demarcation points as complainants request is not based on any technical reasons or concern for risk of harm to the public network if customers are allowed to access embedded wire.
102. GTESW does not have a regular practice of selling or allowing third parties to use its previously installed network cable.
103. GTESW's written demarcation practice does not address whether GTESW will sell its previously installed network wiring at apartment complexes.

- 104 GTESW's tariff in question does not address the sale of GTESW's previously installed cable to third parties
- 105 The parties agree to the admission of exhibits A through M

ATTACHMENT B

ATTACHMENT B

Demarcation Guidelines BTL Work Order Process

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1. General

1.1

Purpose

This practice provides

- Specific guidance for establishing the demarcation point in accordance with FCC Docket 88-57
- A uniform approach to labor and material accounting.
- Guidelines and procedures for preparing below-the-line (BTL) work orders and estimates associated with the installation and maintenance of customer premises wiring

1.2

Filing

Instructions

and

Supersedures

File this practice in numerical order in your GTE Telephone Operations practices set.

This practice supersedes and cancels:

- All policies, procedures, general instructions, letters, and memoranda which address this subject
- Any document which provides information contrary to the information contained in this practice

1. General, continued

1.3 Responsibility

This practice was published by the GTE Telephone Operations Administrative Services Department. For more information about this practice, contact the Headquarters Outside Plant Engineering Department.

1.4 Disclaimer

This practice was prepared solely for the use of GTE Telephone Operations. It must be used only by its employees, contractors, customers and end users, when installing, operating, maintaining, and repairing GTE Telephone Operations equipment, facilities and services. Any other use of this practice is forbidden. The information contained in this practice may not be applicable in all circumstances and is subject to change without notice. By using this practice the user agrees that GTE Telephone Operations will have no liability (to the extent permitted by applicable law) for any consequential, incidental, special, or punitive damages that may result.

2. Overview

2.1 Introduction

The Federal Communications Commission (FCC) issued an order in Docket 88-57 adopting rules for connection of simple and complex wiring to the telephone network. The 1986 GTE Business Policy on the demarcation of inside wire was superseded by the FCC order; this practice conforms GTE to the FCC-mandated procedures. All elements of this practice must be adopted and implemented by all operating regions and divisions, for all classes of network services, except for those locations where other simple wiring applications have been mandated through individual state regulatory commission/agency rulings.

This document provides:

- Specific guidance for establishing the demarcation point in accordance with FCC Docket 88-57, i.e., the point of demarcation is established at the minimum point of entry at all locations except those where local regulatory commissions/agencies overrule the FCC.
- A uniform approach to labor and material accounting.
- Guidelines and procedures for preparing below-the-line (BTL) work orders and estimates associated with the installation and maintenance of customer premises wiring. These procedures detail the linkages and responsibilities of the following above-the-line (ATL) and BTL organizations:

- Network Provisioning

- Network Engineering

- Business Services

- Marketing and Sales

- Special Services

2. Overview, continued

2.2 Definitions

The following chart provides definitions for the acronyms and terms used in this practice.

Acronym or Term	Definition
Above-the-Line	A term used to indicate activities associated with regulated telephone company-owned facilities.
ASF	Access Service Request
Below-the-Line	Refers to products and services that are not regulated. It includes installations and sales by Premises Systems and Services (PSS) and the deregulated customer-owned building wiring or cabling.
BICS	Business Industry Consulting Service
BOC	Business Office Center
BSO	Business Service Order
BSOC	Business Service Order Center
Building Owner	The owner of the dwelling or building defined under customer premises. (The building owner is the owner of the customer premises.) The building may be, but is not limited to, an individual residence, office building, business complex, shopping mall or center, single-unit and/or multi-unit location, etc.
Complex Wiring	All customer premises locations with more than two lines. These locations are usually associated with PBX, key system equipment, or other services including Centranet [®] and/or special services. Other names of complex wiring include intrasystem and inside wire.
COPS	Customer Order Processing System
CPE	Customer Premises Equipment
Customer	An individual, business, or interexchange carrier that applies for service from GTE. The customer may or may not be the building owner or the end-user of the service.

(continued)

Centranet[®] is a registered trademark of GTE Service Corporation.

2. Overview, continued

2.2

Definitions, continued

Acronym or Term	Definition
Customer Premises	A building or legal unit of real property (such as a lot) on which a dwelling unit is located. The customer premises may or may not have a separate physical address associated with the dwelling.
DA	Dispatch Administration Center
Demarcation point	The point of interconnection between telephone company communications facilities and terminal equipment, protective apparatus, or wiring at a customer's premises.
FAC	Facility Administration Center
FCC	Federal Communications Commission
GPR	Ground Potential Rise
HV	High Voltage
I&R	Installation and Repair
Interpositioning	The placing of ATL equipment or facilities on the customer side of the demarcation point.
Intra-building Cable	Cable of any sheath which runs from the minimum point of entry (demarcation point on new installations) to a distribution terminal. A distribution terminal is usually located on each floor of a multistory building. If the network demarcation point is at the distribution terminal, then maintenance and rearrangement of this cable is the responsibility of GTE on a regulated basis. If the network demarcation point is at the minimum point of entry, the maintenance and rearrangement of this cable is the customer's responsibility.
ISDN	Integrated Services Digital Network
Lineskeeper	The monthly simple wiring maintenance charge offered to single-line residential and business customers only. It is not offered for wiring associated with B1s, key systems, or PBXs.
MAR [®]	Mechanized Assignment Record Keeping system

(continued)

2. Overview, continued

2.2

Definitions, continued

Acronym or Term	Definition
Minimum Point of Entry	<p>The FCC defines minimum point of entry as:</p> <p>Either (1) the closest practical point to where the wiring crosses a property line, or (2) the closest practical point to where the wiring enters a multi-unit building or buildings. The telephone company's reasonable and nondiscriminatory standard operating practice shall determine which of (1) or (2) shall apply. The telephone company is not precluded from establishing reasonable classifications of multi-unit premises for purpose of determining which of (1) or (2) above shall apply."</p> <p>The point of minimum entry for single-unit locations is:</p> <ul style="list-style-type: none">• 12 inches from the protectorOR• 12 inches from where the telephone cable enters the customer's premises (where there is no protector)
Multi-Unit Location	<p>A premises or building occupied by more than one customer. Multi-unit locations include, but are not limited to:</p> <ul style="list-style-type: none">• Residential.• Commercial.• Shopping centers and malls.• Campus environments.• RV and mobile home parks.• Masses and campgrounds.
NTE	Network Channel Terminating Equipment
NEC	National Electrical Code
NESC	National Electrical Safety Code
Network Interface Device (NID)	<p>An apparatus utilized to make the physical interconnection between telephone company-owned facilities and customer-owned wiring. A network interface device is installed for each customer at the point of demarcation on a going-forward basis. A GTE system standard and approved label is placed upon the NID to identify the demarcation point.</p>

(continued)

2. Overview, continued

2.2 Definitions, continued

Acronym or Term	Definition
Network Interface Jack (NIJ)	A jack utilized to make the physical interconnection between telephone company-owned facilities and customer-owned wiring. The FCC has eliminated the requirement that the customer connect simple inside wire through a telephone company-provided plug and jack arrangement at the point of demarcation. Local regulatory agencies and/or jurisdictions may have additional rules on simple wiring. Where plugs and jacks are mandated by state commissions, NIJs are installed as outlined within each respective state order. In all other states, the plug and jack arrangement are not routinely installed at simple wiring locations. GTE placement of plug and jack arrangements for complex wiring is unchanged.
Network Terminating Wire	Wire between the distribution terminal on the floor and the former network interface or jack. In instances where the PBX/key system bypasses the distribution terminal and connects at the network demarcation point, this wire is network terminating wire.
OSP	Outside Plant
PCM	Project Control Memorandum
P&S	Premises Systems and Services
RTU Agreement	Right-to-Use Agreement
Simple Wiring	A customer premises served by one or two lines. This refers to all one- and two-line telephone wiring (including associated jacks) on the customer's side of the demarcation point, whether owned and installed by the customer, premises owner, agent, or local exchange carrier.
Single-Unit Locations	A premises or building occupied by a single customer.
SSCC	Special Service Control Center
Stand-Alone Wiring	Wiring associated with installation of key systems, PBXs, or building wiring alone. This type of service does not include providing any form of network access or service and could be provided in an out-of-franchise area.
T&M	Time and Material

2. Overview, continued

2.3

References

The following documents are referenced in this practice and could be required for performing certain related tasks.

For information About...	See...
Station Protection – Mobile Homes – Installation	Practice 435-305-200
SSOC – Standard Provisioning Process	Practice 440-000-011
Business Order Center Order Control	Practice 645-500-001
Electrical Protection of Telecommunication Facilities Serving Power Stations	Practice 887-000-070
Star Codes	620-000-004
National Electrical Code Articles 770-33 and 250-71(B)	1990 National Electrical Code
IEEE Standard 487	Recommended practice for the protection of wire lines for telecommunication facilities servicing electrical power stations.
Account Codes	GTE Telephone Operations Standard Chart of Accounts Nonregulated operations

3. Demarcation

3.1

Statement of Position

Going forward, GTE Telephone Operations' position is to terminate regulated network facilities at the minimum point of entry. GTE establishes its point of demarcation within 12 inches, or as close as practical, to the network protector when entering single- or multi-unit premises or, in the alternative, within 12 inches, or as close as practical, to crossing the property line. Each point of demarcation shall be clearly marked by affixing approved decals for the telephone company on the customer side of the interface device. See Section 3.3.7. GTE will continue to perform premises wiring as a BTL service.

3.2

Applications

The following sections provide guidelines and examples of specific applications.

3.2.1 Existing and New Single-Unit Locations

The point of demarcation for existing and new single-unit locations must:

- Be established on the exterior of the building at residential locations
- Be established on the exterior or the interior of the building at business locations
- Be established within 12 inches or as close as practical to the protector on new locations
- Revert to within 12 inches or as close as practical to the protector on existing locations

The network facility must be grounded in accordance with the National Electrical Code (NEC) at the point of demarcation.

NOTE: The premises owner is responsible for providing access to the ground electrode. GTE locates the protector within 20 feet of the AC power service ground and make connections per National Electrical Code (NEC) Article 250-71(B). The grounding conductor for the protector must be a maximum of 20 feet in length. The actual conductor length should be less than 20 feet, if possible. This GTE specification is imposed in order to reduce the probability of electrical shock.

See Exhibits 1-3 for examples of establishing the demarcation for existing and new single-unit locations.